

1 THE HONORABLE JUSTIN L. QUACKENBUSH  
2 COUGHLIN STOIA GELLER  
3 RUDMAN & ROBBINS LLP  
4 JOHN K. GRANT  
5 PHILLIP G. FREEMON  
6 100 Pine Street, Suite 2600  
7 San Francisco, CA 94111  
8 Telephone: 415/288-4545  
9 415/288-4534 (fax)

10 Lead Counsel for Plaintiff

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON  
AT SPOKANE

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12 PLUMBERS UNION LOCAL NO. 12 }  
13 PENSION FUND, Individually and on }  
14 Behalf of All Others Similarly Situated, }  
15 Plaintiff, }  
16 vs. }  
17 AMBASSADORS GROUP INC., et al., }  
18 Defendants. }  
19 }  
20 }  
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No. CV-09-00214-JLQ  
CLASS ACTION  
DECLARATION OF JOHN K.  
GRANT IN SUPPORT OF LEAD  
PLAINTIFF PLUMBERS UNION  
LOCAL NO. 12 PENSION FUND'S  
OPPOSITION TO DEFENDANTS  
AMBASSADORS GROUP INC.,  
JEFFREY D. THOMAS AND  
MARGARET M. THOMAS' MOTION  
TO DISMISS FIRST AMENDED  
COMPLAINT FOR VIOLATIONS OF  
FEDERAL SECURITIES LAWS

ORAL ARGUMENT REQUESTED

DATE: May 20, 2010  
TIME: 1:30 p.m.  
CRTRM: The Honorable Justin L.  
Quackenbush

1 I, JOHN K. GRANT, declare as follows:

2 1. I am an attorney duly licensed to practice before all of the courts of the  
 3 States of California and Colorado and am permitted to participate in this case *pro hac*  
 4 *vice* on behalf of plaintiff. I am a member of the law firm of Coughlin Stoia Geller  
 5 Rudman & Robbins LLP, one of the counsel of record for plaintiff in the above-  
 6 entitled action. I have personal knowledge of the matters stated herein and, if called  
 7 upon, I could and would competently testify thereto.

8 2. Attached are true and correct copies of the following exhibits:

9 Exhibit A: Excerpt from iRipoff.com, *Read Complaint; People to People –*  
 10 *Marketing Fraud*, July 25, 2008, [http://iripoff.com/1383/](http://iripoff.com/1383/People_To_People.html)  
 11 *People\_To\_People.html* (last visited Mar. 11, 2010);

12 Exhibit B: Lisa Wade McCormick, *Parents Object to Student*  
 13 *Lists*, ConsumerAffairs.com, Nov. 20, 2006, [http://www.consumeraffairs.com/news04/2006/11/people\\_to\\_people\\_lists.html](http://www.consumeraffairs.com/news04/2006/11/people_to_people_lists.html)  
 14 (last visited Mar. 11, 2010); and

15 Exhibit C: Excerpt from Ambassadors Group, Inc. Form 10-Q filed with the  
 16 Securities and Exchange Commission on November 5, 2009.

17 I declare under penalty of perjury under the laws of the United States of  
 18 America that the foregoing is true and correct. Executed this 11th day of March,  
 19 2010, at San Francisco, California.



18 JOHN K. GRANT  
 19

20 COUGHLIN STOIA GELLER  
 21 RUDMAN & ROBBINS LLP  
 22 JOHN K. GRANT  
 23 PHILLIP G. FREEMON  
 24 100 Pine Street, Suite 2600  
 25 San Francisco, CA 94111  
 Telephone: 415/288-4545  
 415/288-4534 (fax)  
 E-mail: [jgrant@csgrr.com](mailto:jgrant@csgrr.com)  
 E-mail: [freemon@csgrr.com](mailto:freemon@csgrr.com)

26 Lead Counsel for Plaintiff

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DEC OF J K GRANT IN SPRT OF LD PLTF  
 PLUMBERS UNION LOCAL NO. 12 PENSION  
 FUND'S OPP TO DFTS AMBASSADORS GRP, J  
 D THOMAS & M M THOMAS' MTN TO DISMISS  
 FIRST AMND COMPL (CV-09-00214-JLQ)

COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP  
 100 Pine Street, 26th Floor, San Francisco, CA 94111  
 Telephone: 415/288-4545 • Fax: 415/288-4534

## CERTIFICATE OF SERVICE

I hereby certify that on March 11, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Mario Alba, Jr.  
Coughlin Stoia Geller Rudman & Robbins LLP  
E-mail: malba@csgrr.com

Karl P. Barth, WSBA No. 22780  
Hagens Berman Sobol Shapiro LLP  
E-mail: [KarlB@hbsslaw.com](mailto:KarlB@hbsslaw.com)

John K. Grant  
Coughlin Stoia Geller Rudman & Robbins LLP  
E-mail: [jgrant@csgrr.com](mailto:jgrant@csgrr.com)

Douglas W. Greene, WSBA No. 22844  
Wilson Sonsini Goodrich & Rosati  
E-mail: dgreene@wsgr.com

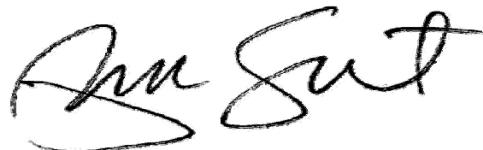
Barry M. Kaplan, WSBA No. 8661  
Wilson Sonsini Goodrich & Rosati  
E-mail: [bkaplan@wsgr.com](mailto:bkaplan@wsgr.com)

Stellman Keehnel, WSBA No. 9309  
DLA Piper LLP (US)  
E-mail: stellman.keechnel@dlapiper.com

David A. Rosenfeld  
Coughlin Stoia Geller Rudman & Robbins LLP  
E-mail: [drosenfeld@csgrr.com](mailto:drosenfeld@csgrr.com)

Samuel H. Rudman  
Coughlin Stoia Geller Rudman & Robbins LLP  
E-mail: [srudman@csgrr.com](mailto:srudman@csgrr.com)

1 I certify under penalty of perjury under the laws of the United States of America  
2 that the foregoing is true and correct. Executed on March 11, 2010.  
3  
4  
5



6 JOHN K. GRANT  
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COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP  
100 Pine Street, 26th Floor  
San Francisco, CA 94111  
Telephone: 415/288-4545  
415/288-4534 (fax)  
E-mail: [jgrant@csgrr.com](mailto:jgrant@csgrr.com)

12 Lead Counsel for Plaintiff  
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